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6 *Attorneys for Defendant,*  
7 *Atlantic Richfield Company*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 SUNSET COMMERCIAL LLC, a  
11 Nevada Limited Liability Company,

12 Plaintiff,

13 vs.

14 STAUFFER MANAGEMENT  
COMPANY, a Delaware Limited  
Liability Company; MONTROSE  
15 CHEMICAL CORPORATION OF  
CALIFORNIA, a Delaware Corporation;  
ATLANTIC RICHFIELD COMPANY,  
16 a Delaware Corporation; OLIN  
CORPORATION, a Virginia  
17 Corporation, TITANIUM METALS  
CORPORATION, a Delaware  
18 Corporation; NL INDUSTRIES, INC., a  
New Jersey Corporation; LE  
19 PETOMANE XXVII, INC., an Illinois  
Corporation, in its representative  
20 capacity as the NEVADA  
ENVIRONMENTAL RESPONSE  
21 TRUST TRUSTEE; and the UNITED  
STATES OF AMERICA.

22 Defendants.  
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Case No.: 2:23-cv-02081-GMN-BNW

**STIPULATION AND ORDER**  
**EXTENDING TIME FOR**  
**DEFENDANT ATLANTIC**  
**RICHFIELD COMPANY TO FILE**  
**RESPONSIVE PLEADING TO**  
**AMENDED COMPLAINT**

(FIRST REQUEST)

24 Pursuant to LR IA 6-1, 6-2, and LR 7-1, Plaintiff SUNSET COMMERCIAL LLC  
25 (“Plaintiff”), and Defendant ATLANTIC RICHFIELD COMPANY (“Atlantic  
26 Richfield”), by and through their counsel of record, hereby agree and stipulate to extend  
27 the time allowed for Atlantic Richfield to respond to Plaintiff’s Amended Complaint, up

1 to and including May 14, 2024. This is the first request to extend this date for Atlantic  
2 Richfield. However, similar requests have been filed by other parties. Based upon  
3 Atlantic Richfield's filed waiver of service (ECF No. 19), its responsive pleading would  
4 otherwise be due on May 7, 2024.

5 This Stipulation is entered into to accommodate the needs and orderly presentation  
6 of the case as a whole regarding Atlantic Richfield. Plaintiff has filed an Amended  
7 Complaint on April 15, 2024 (ECF No. 35), and counsel for Atlantic Richfield would  
8 appreciate additional time to review, investigate, and prepare a response.

9 Further, this case involves multiple parties, who are engaged in preliminary  
10 discussions and considering the possibility of mediation and other actions to streamline  
11 the dispute. This request will allow additional time for those discussions.

12 Discovery has not commenced in this case, and no Defendant has yet filed an  
13 answer or motion in response to the Amended Complaint, and therefore this request will  
14 cause no delay and is consistent with the orderly, just, and efficient determination of this  
15 proceeding.

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1 This Stipulation is made for good cause and not for the purposes of delay. Nothing  
2 contained in this Stipulation shall be deemed a waiver of any right belonging to any party  
3 hereto.

4 IT IS SO STIPULATED.

5 DATED this 26<sup>th</sup> day of April, 2024.

DATED this 26<sup>th</sup> day of April, 2024.

6 PARSONS BEHLE & LATIMER

DOTSON LAW

7  
8 /s/ RICHARD J. ANGELL

/s/ ROBERT A. DOTSON

RICHARD J. ANGELL

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12 (775) 323-1601

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*Attorneys for Plaintiff*

*Attorneys for Defendant,*

*Atlantic Richfield Company*

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14  
15 IT IS SO ORDERED.

16 DATED this 29 day of April, 2024.

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UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of DOTSON LAW and that on this date I caused to be served a true and correct copy of the foregoing by:

☐ (BY MAIL) on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At Dotson Law, mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.

☒ By electronic service by filing the foregoing with the Clerk of Court using the CM/ECF system, which will electronically mail the filing to the following individuals.

☐ (BY PERSONAL DELIVERY) by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.

☒ Email.

addressed as follows:

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8 *Attorney for Defendant, Olin*  
9 *Corporation*

10 DATED this 26<sup>th</sup> day of April 2024.

11 /s/ L. MORGAN BOGUMIL  
12 L. MORGAN BOGUMIL  
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